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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

TERESA BUSTAMONTE,
Defendant.

2:14-cr-0102-JAD-VCF

**STIPULATION TO CONTINUE
SENTENCING**

IT IS HEREBY STIPULATED AND AGREED by and between defendant, TERESA BUSTAMONTE, by and through her counsel, CHRIS T. RASMUSSEN, ESQ., and the United States America, by its counsel, NICHOLAS DICKENSON Assistant U.S. Attorney, that the above-captioned matter currently scheduled for November 16, 2015 at 10:00 a.m. be vacated and continued until for at least 90 days or a time convenient to the court.

This Stipulation is entered into for the following reasons:

1. The Government and Defendant are still in negotiations;
2. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to this continuance;
3. Denial of this request for continuance of the parties deadline for the filing of pre-trial motions and responsive pleadings would deny the parties herein sufficient time within which to be able to effectively and thoroughly research, prepare and submit for filing appropriate pre-trial motions and notices of defense, taking into account the exercise of due diligence.
4. Additionally, denial of this request for a continuance could result in a miscarriage of

1 justice.

2 6. This is the third request for continuance of sentencing .

3 DATED this 4nd day of November, 2015.

4
5 /s/ Chris T. Rasmussen

6 CHRIS T. RASMUSSEN, ESQ.
7 Attorney for Defendant

/s/ NICHOLAS DICKENSON

NICHOLAS DICKENSON, ESQ.
Assistant U.S. Attorney

CHRIS T. RASMUSSEN, ESQ.
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330 South Third Street, Suite 1010
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(702) 464-6007
Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

ALBERT PLANELLS,
Defendant.

Case No.: 2:14-cr-00260-JAD-GWF

**FINDINGS OF FACT AND
CONCLUSIONS OF LAW**

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. The parties agree to a continuance;
2. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to this continuance.

CONCLUSIONS OF LAW

1. Denial of this request for a continuance would result in a miscarriage of justice.
2. For all the above- stated reasons, the ends of justice would best be served by a continuance of the sentencing date at least ninety days.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TERESA BUSTAMONTE,

Defendant.

2:14-cr-0102-JAD-VCF

ORDER

ORDER

Accordingly, IT IS SO ORDERED that the sentencing currently scheduled for November 16, at the hour of 10:00 a.m., be vacated and continued to Tuesday, February 16, 2016, at 9:00 a.m. in Courtroom #6D.

Dated this 5th day of November, 2015.


UNITED STATES DISTRICT JUDGE